STATE OF CALIFORNIA **Budget Change Proposal - Cover Sheet**

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Fiscal Year 2018-19	Business Unit 3540	Department Forestry and Fire Pre	Department Forestry and Fire Protection					
Budget Request Name Program 3540-402-BCP-2018-MR 2461 OFFICE OF THE FIRE MARSHAL			Subprogram HE STATE 2461010 OFFICE OF THE STATE FIRE MARSHAL					
Budget Reques Implementation Disposal)	•	wardship Program for S	Seized, Illegal Fire	works (Education	, Enforcement, and			
Environmental I Marshal (OSFM state's efforts to reimbursement to reflect anticip retail sales of "s stewardship org fireworks. This that are seized	t of Forestry and F License Plate Fund) to oversee the new reduce the influx of authority to the Stated ated reimburseme afe and sane" firewant proposal would reseand stockpiled throands for fireworks	ire Protection (CAL FIR in fiscal year 2018-19 ewly created Fireworks of illegal fireworks into t ate Fire Marshal Firewor ints that will be funded to works. The reimbursem and partner with the OSF solve the long-standing aughout the state and preducation, enforcement	and two ongoing patewardship Progues the state. This process Enforcement a hrough the imposition of the manage seizes issue of disposal rovide a stable, los	positions for Office tram (FSP) and to oposal also requested to Disposal Function of a managed by a nonprofited commercially of illegal and dangererm funding second	e of the State Fire increase the sts \$2.1 million in d starting in 2019-20 ment charge on tifireworks viable illegal gerous fireworks ource to support the			
Requires Legisl	ation No		Code Section(s) Health and Safet	to be Added/Ame ty Code	ended/Repealed			
Does this BCP components?	contain information Yes No		Department CIO	Date				
If yes, departme	ental Chief Informa	tion Officer must sign.						
	, specify the projec 4PRA), and the ap	t number, the most rece proval date.	ent project approv	al document (FSF	R, SPR, S1BA,			
Project No.	Pro	ject Approval Documer	nt:	Al	pproval Date:			
		nent, does other depart			Yes			
Prepared By		Date	Reviewed By		Date			
Department Dire	Department Director Date		Agency Secretary		Date			
PPRA	Additional Review: Capital Outlay ITCU FSCU OSAE CALSTARS Dept. of Technology PPBA Original Signed By: Date submitted to the Legislature							

A. Budget Request Summary

The Department of Forestry and Fire Protection (CAL FIRE) requests one-time funding of \$3.6 million California Environmental License Plate Fund in fiscal year 2018-19 and two ongoing positions for Office of the State Fire Marshal (OSFM) to oversee the newly created Fireworks Stewardship Program (FSP) and to increase the state's efforts to reduce the influx of illegal fireworks into the state. This proposal also requests \$2.1 million in reimbursement authority to the State Fire Marshal Fireworks Enforcement and Disposal Fund starting in 2019-20 to reflect anticipated reimbursements that will be funded through the imposition of a management charge on retail sales of "safe and sane" fireworks. The reimbursements will be provided by a nonprofit fireworks stewardship organization that would partner with the OSFM to manage seized commercially viable illegal fireworks. This proposal would resolve the long-standing issue of disposal of illegal and dangerous fireworks that are seized and stockpiled throughout the state and provide a stable, long-term funding source to support the increasing demands for fireworks education, enforcement, and disposal. Trailer bill language is also requested to implement this proposal.

B. Background/History

California Health and Safety Code (HSC) section 12552 requires the OSFM to regulate fireworks in the state. HSC section 12726 requires the OSFM to destroy dangerous and illegal fireworks once they are seized by local fire departments or law enforcement agencies. Fireworks are classified through laboratory analysis, field examinations, and the test firing of firework devices. Such classified fireworks include those devices known as "safe and sane", or consumer fireworks, agricultural, wildlife, emergency signaling devices, party poppers and snap caps, and model, high-power, and experimental rocket motors. As part of the program, the OSFM requires the licensing of all pyrotechnic operators; fireworks manufacturers; importer-exporters, wholesalers, retailers, and public display companies.

There are three broad types of illegal fireworks that are seized by local enforcement agencies:

- Dangerous fireworks as defined in HSC section 12505.
- Consumer fireworks that are approved for sale at the federal level but are not approved for sale in California ("federally legal" fireworks).
- "Safe and sane" fireworks that are legal for sale in California annually between June 28 and July 6, but are sold or possessed outside of this period or in an area where the local permitting entity has not approved their use.

These seized fireworks are then stockpiled for eventual collection and disposal by the OSFM pursuant to HSC section 12726. These seized, illegal fireworks are classified as hazardous waste and must be disposed as such. The approach for disposal has previously taken two forms: (1) burning of unpackaged fireworks under an emergency burn permit issued by the Department of Toxic Substances Control (DTSC), and (2) shipping of fireworks in their original federally-approved packaging out-of-state for disposal through a federally approved waste hauler.

In 2013, CAL FIRE was notified by DTSC that the burn facility previously utilized for disposal purposes was no longer available to be utilized for open burn of fireworks. Additionally, DTSC notified CAL FIRE that the seized illegal and dangerous fireworks no longer met the eligibility criteria for emergency burn permits because they are seized on an annual basis. The lack of an emergency permit and approved facility to burn fireworks eliminated one of the two available options for the treatment of seized fireworks. As a result, all seized fireworks must be transported by a federally approved waste hauler to an approved out-of-state hazardous waste facility.

Chapter 563 of the Statutes of 2007 (SB 839, Calderon) created HSC section 12728, which established the Fireworks Enforcement and Disposal Fund (Fireworks Fund). SB 839 attempted to create a mechanism for fireworks enforcement and disposal through new and increased fines and penalties with a revenue sharing component for local jurisdictions as an incentive for increased enforcement of illegal fireworks. HSC section 12728 states that all moneys collected from increased fines and penalties from the seizure of illegal fireworks shall be deposited into the Fireworks Fund and shall be available, upon appropriation by the Legislature, to CAL FIRE for exclusive use in statewide programs for the enforcement, prosecution related to, disposal, and management of seized dangerous fireworks, and for the education of public safety agencies in the proper handling and management of dangerous fireworks. Since its establishment, the

Fireworks Fund has failed to provide a stable source of funding for the intended use. The only currently available funding source is fines and penalties assessed by local jurisdictions on those persons found to be in possession of illegal fireworks. However, this has not yielded a sufficient amount of funding for disposal costs. CAL FIRE received a one-time \$1.5 million appropriation from the Toxic Substance Control Account (TSCA) in 2014-15 and then another one-time \$5 million appropriation from the TSCA in 2015-16 to fund the disposal of illegal, seized fireworks to address the insufficient revenue stream. Without disposal funding beyond these one-time appropriations, a stockpile of illegal, seized fireworks has accumulated over time.

In recognition of the need for a stable funding source to address the enforcement, education and disposal of illegal fireworks, the Administration has been working with the fireworks industry, local law enforcement and fire agencies, as well as representatives of cities and counties, to identify a long-term, sustainable funding model that increases the enforcement and education and reduces the amount of hazardous waste disposal.

The Administration has determined that a new model is needed for the management of illegal, seized fireworks. This model involves establishing a fireworks stewardship organization within and funded by the fireworks industry that will partner with the OSFM to manage the disposition of these products. Implementation of this proposal requires adoption of Trailer Bill Language (TBL) to establish the stewardship organization and provide a long-term, sustainable funding model that reduces the amount of hazardous waste requiring disposal. In particular, the proposed TBL would allow undamaged products that are illegal in California but legal under federal law and in certain states to be repurposed as opposed to being treated as hazardous waste. The proposed TBL requires that beginning January 1, 2019, membership in the fireworks stewardship organization is necessary for the State Fire Marshal to issue or renew a wholesale license for the sale of safe and sane fireworks. Additionally, the proposed TBL would make technical, non-substantive changes to other sections of the HSC as it relates to fireworks.

Workload History

Workload Measure*	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
Disposal of illegal and	60,000	104,500	220,000	542,000	175,000	
dangerous seized fireworks.	Pounds	Pounds	Pounds	Pounds	Pounds	
Stockpile of illegal and						000 00044
dangerous seized fireworks						220,000**
needing to be disposed.						Pounds

^{*}The amount of stockpiled illegal and dangerous fireworks has varied historically given that local law enforcement interdictions and/or stings can increase the stockpile beyond what is amassed from day-to-day state and local government law and fire operations.
**Average fireworks seized and requiring disposal.

C. State Level Considerations

With rapid population growth in the state and the commensurate growth of the sale of state-approved "safe and sane" fireworks, along with illegal and dangerous fireworks that continue to flow into California, additional pressures are being placed on CAL FIRE to provide enforcement, education, and disposal of seized illegal and dangerous fireworks. Without stable funding, current fireworks disposal and enforcement operations within the state are deteriorating, and the seized fireworks stockpile is continuing to grow. The accumulation of seized fireworks creates a significant hazard to the environment. It also presents fire and life safety risks, which in turn creates an increased liability to both CAL FIRE and the state of California.

This proposal is consistent with CAL FIRE's mission, as well as the goals and objectives of the 2010 California Strategic Fire Plan:

- Goal #6: Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
- Goal #6 (Objective C). Initiate studies and analyses to identify appropriate staffing levels and
 equipment needs commensurate with the current and projected emergency response environment.

This proposal is also consistent with the goals and objectives of CAL FIRE's 2012 Strategic Plan.

- Goal: Cultivate and strengthen relationships with stakeholders, governing bodies, cooperators, and the public.
 - Objective: Be responsive and receptive to the concerns and needs of the public, as well as local, state, and federal cooperators, the Board of Forestry and Fire Protection, and other stakeholders.

To meet these goals and objectives, CAL FIRE will increase public safety and reduce environmental harm by improving the fireworks enforcement, education, and disposal through this proposal.

D. Justification

The lack of enforcement of illegal fireworks has been a continued issue for California, requiring a major overhaul of how the state addresses and disposes of dangerous and illegal fireworks. Without a stable funding source for disposal, the confiscation of illegal and dangerous fireworks throughout the state has created a significant hazard to the environment and poses a fire and life safety risk. This proposal addresses the need for increased enforcement and education as well as funding for disposal.

Fireworks Stewardship Program

This proposal would require wholesalers of "safe and sane" fireworks, of which there are currently four operating in the state, to form a fireworks stewardship organization and create a fireworks stewardship plan as a condition of receiving their annual licensure from the OSFM.

This fireworks stewardship organization would be responsible for:

- Recommending the amount of the fireworks management charge sufficient to fund the revenue requirements set forth in the approved fireworks stewardship program budget.
- Providing funding to CAL FIRE for fireworks enforcement, education, and disposal as well as conducting reviews, and monitoring of the fireworks stewardship organization.
- Creating a plan with state and local law enforcement to reduce the volume of illegal fireworks entering California.
- Creating a plan to ensure that any of the non-"safe and sane" fireworks that are managed by the
 organization do not return to California.
- Receiving any seized fireworks that the OSFM determines to be commercially viable and relocating them outside of the state.

The fireworks stewardship organization would be responsible for submitting an annual report to the OSFM documenting (1) the prior year's revenues from the resale of commercially viable fireworks received from the OSFM. (2) the location of the resales, and (3) any administrative costs incurred by the organization, including the implementation cost of the fireworks stewardship plan.

The initial funding for the OSFM's implementation of the fireworks stewardship program in 2018-19 would be from the California Environmental License Plate Fund (ELPF), which would allow the fireworks stewardship organization to begin receiving and relocating the seized commercially viable fireworks from the current stockpile and the OSFM to dispose of the remainder of the current stockpile. The proposed TBL would authorize the transfer of the commercially viable fireworks from the OSFM to the fireworks stewardship organization. It is estimated that approximately 80 percent of all fireworks seized are commercially viable or even "safe and sane" fireworks. By allowing the fireworks stewardship organization to repurpose those fireworks, the amount of fireworks requiring disposal will be significantly reduced.

In 2019-20 and thereafter, \$2.1 million will be reimbursed by the fireworks stewardship organization and deposited into the Fireworks Fund, through a management charge assessed on the retail sale of "safe and sane" fireworks, to fund the ongoing costs of the fireworks stewardship program.

Role of the OSFM

Under the proposed TBL, the OSFM would be responsible for oversight of the fireworks stewardship organization and will continue its responsibility to enforce, educate, and dispose of illegal, non-commercially viable fireworks. To accomplish this, CAL FIRE would require four positions. Currently, CAL FIRE has existing authority for two positions in the Fire Engineering and Investigations Division that

are no longer funded due to the lack of revenue into the Fireworks Fund to support them. This proposal requests funding for these two existing positions as well as the authority and funding for an additional two positions.

- 2.0 Arson & Bomb Investigators (ABI) (existing and currently unfunded) These positions would be responsible for working on the collection, handling, and sorting of seized fireworks, as well as the transfer of seized commercially viable fireworks to the fireworks stewardship organization. As peace officers, they would participate in the enforcement of California fireworks laws and coordinate with local jurisdictions. The positions would also provide training to local seizing entities.
- 1.0 Associate Governmental Program Analyst (new) This position would be responsible for
 reviewing the annual report submitted by the fireworks stewardship organization and providing
 analysis and recommendations to OSFM management. Other duties would include overseeing
 audit responsibilities, preparing required reports, coordinating education efforts, and managing
 fireworks enforcement grants to fire and police departments.
- 1.0 Staff Services Analyst (new) This position would assist in the coordination of the statewide and local fireworks task forces. The position would work with the local seizing entities to coordinate the pickup and sorting of fireworks at collection sites. Other duties would include supporting the review of the fireworks stewardship organization plan, processing enforcement grants, and assisting with fireworks licensing to ensure compliance with the fireworks stewardship organization membership requirements.

Addressing Illegal Fireworks

In the process of developing this comprehensive solution, all the stakeholders identified the need for a cohesive statewide effort to reduce the amount of illegal fireworks entering California. These illegal fireworks present a significant public safety risk, particularly as the state continues to experience climate change and extended drought, and generate additional costs for seizure, sorting, shipment, and repurposing.

To address this issue, the proposal would require the OSFM to convene a task force comprised of local fire and law enforcement departments as well as state and federal entities to develop ways to reduce the volume of illegal fireworks entering the state. This proposal includes funding to support the OSFM in coordinating the task force and its activities.

Additional enforcement by the state will be integral to addressing the influx of illegal fireworks. To fulfill its enforcement role, this proposal provides the OSFM with ongoing funding to support the two existing ABI positions in the fireworks stewardship program. As explained above, these positions are currently vacant given the lack of a stable funding source for them.

The ABI duties will include the following:

- Conduct fireworks enforcement (perform fireworks booth inspections during the July 4 sale period and conduct investigations, act on complaints, etc.).
- Provide training to local jurisdictions (enforcement, citations, storage, handling of materials, disposal process, etc.).
- Conduct fireworks interdiction (enforcement operations by CAL FIRE and local fire departments and law enforcement entities to reduce illegal fireworks that enter the state through other states and through the port system).
- Participate in local, state, and federal fireworks enforcement task force groups, including the fireworks task force that would be created under this proposal, and other fireworks related meetings.
- Be available to assist local government in prosecuting fireworks violations.
- Be available to assist the retailers during the sale season (issues with local permits, interpretation of fireworks law and regulations, facilitate and resolve issues between the retailer and local jurisdictions, etc.).

Collect, handle, and sort all seized fireworks to prepare them for disposal or repurposing.

Fine Revenue for the State

Current law requires that 65 percent of any fines and penalties collected at the local level from the prosecution of illegal fireworks offenses to be remitted to the state, the remaining 35 percent is retained by the local entity. This proposal would modify that requirement and instead require that 75 percent of the fines collected be retained by local entities, in recognition there has been very little revenue (less than \$10,000 per year) collected in fines because it has been difficult for local entities to prioritize the prosecution of fireworks offenses given resource limitations. This statutory change is aimed at increasing prosecution by making more funding available for local enforcement, which would help to address the volume of illegal fireworks entering the state.

E. Outcomes and Accountability

If approved, this proposal will allow CAL FIRE to:

- Reduce the potential risks to the public and environment from dangerous fireworks.
- Coordinate and support enforcement efforts with local entities.
- Assist with programs for the enforcement and prosecution related to the seizure of illegal and dangerous fireworks.
- Provide training of public safety agencies regarding proper handling and management techniques and education around safety issues associated with all fireworks and explosives.
- Provide CAL FIRE with staff to work with the newly created fireworks stewardship organization and manage their required stewardship plan.
- Assist in public safety education efforts.
- Safely dispose of illegal dangerous fireworks.

One of the central goals of this proposal is to provide a long-term solution that will reduce the amount of illegal and dangerous fireworks brought into the state, reduce the amount that needs to be seized annually, and mitigate fireworks seizures on an ongoing basis, preventing multi-year accumulations and associated risks, thereby increasing public safety and preventing any environmental impacts.

Projected Outcomes

Workload Measure	CY	BY	BY+1	BY+2	BY+3	BY+4
Disposal of illegal and dangerous seized fireworks through contract with hazardous waste contractor at an Environmental Protection Agency (EPA) registered facility.*	0 Pounds	50,000 Pounds	50,000 Pounds	50,000 Pounds	50,000 Pounds	50,000 Pounds
Stockpile of illegal and dangerous seized fireworks needing to be disposed of through contract with hazardous waste contractor at a EPA registered facility.	220,000 Pounds	0 Pounds	0 Pounds	0 Pounds	0 Pounds	0 Pounds

^{*}Under this proposal, the amount of illegal and dangerous fireworks requiring disposal will drop from an average of 220,000 pounds to approximately 50,000 pounds, as the remainder would be repurposed by the stewardship organization.

F. Analysis of All Feasible Alternatives

Alternative 1: Approve 2018-19 one-time funding of \$3.6 million ELPF and two ongoing positions, to oversee the proposed fireworks stewardship program, including increasing the state's efforts to reduce the influx of illegal fireworks into the state. This proposal also requests ongoing Fireworks Fund reimbursement authority of \$2.1 million starting in 2019-20, which will be provided through the assessment of a management charge on retail sales of "safe and sane" fireworks. The new program would be funded by a nonprofit fireworks stewardship organization. Proposed TBL is needed to implement the proposal.

Cost:

• \$3.6 million ELPF in 2018-19 only and \$2.1 million in reimbursement authority ongoing.

Advantage:

- Provides a long-term solution to address illegal seized fireworks in California.
- CAL FIRE will have funding to provide oversight to the newly formed stewardship organization.
- CAL FIRE can proactively work to reduce the influx of illegal fireworks entering the state.
- CAL FIRE can carry out its statutory mandate to collect and dispose of seized illegal and dangerous fireworks.

Disadvantage:

This alternative will require additional special fund and position authority.

Alternative 2: Do nothing.

Cost:

\$0.

Advantage:

No additional funding or position authority.

Disadvantage:

- CAL FIRE will remain unable to carry out its statutory mandate to manage the collection and disposal of seized illegal fireworks.
- Illegal firework seizures will continue to accumulate with no viable long-term solution for disposal in place.
- Local jurisdictions could be required to store seized fireworks and comply with state and federal hazardous waste laws.
- Could result in potential litigation for noncompliance with the law.
- An increased risk to the safety of the public and property of the state due to availability of illegal and dangerous fireworks in the state and accumulation of hazardous waste from the storage of seized illegal and dangerous fireworks.

G. Implementation Plan

The new management model would be in place for calendar year 2019 sales. Commencing July 1, 2018 (or upon implementation of the TBL), seized fireworks will be managed by the OSFM. In practice, this means that the quantity of fireworks that are not a commercially viable product will be shipped for incineration, while the commercially viable products will be repacked and stored until such point that the fireworks stewardship organization has an approved fireworks stewardship plan by the OSFM and can take possession of the material. The fireworks stewardship organization will be responsible for reimbursing the state for the ongoing costs of the fireworks stewardship program (as approved in the annual Budget Act), up to the amount collected from a management fee assessed on retail sales of safe and sane fireworks, but not to exceed three percent of annual gross sales.

H. Supplemental Information

CAL FIRE is requesting one-time funding in 2018-19 for the purchase of two vehicles for the existing ABI positions. These vehicles are needed to facilitate enforcement, interdiction, and training requirements related to the positions. There are no additional vehicles that can be redirected due to the current cap on vehicles, therefore, funding in 2018-19 is necessary to acquire and pay for the new vehicles.

Additional Out-of-State Travel funding of \$10,000 in 2018-19 is needed to provide specialized training for the newly hired ABIs and continuing education that can only be obtained outside of California. In addition, ongoing funding of \$21,000 is needed for each position's training and equipment.

Further, CAL FIRE is requesting one-time funding for a per-position facility component, consistent with State Administrative Manual section 6453, to account for the marginal adjustments of staff. The current Sacramento office space is insufficient for the additional staff, and OSFM is in the process of relocating its Sacramento office to another larger location that can accommodate the existing and additional staff.

In order to properly dispose of all non-commercially viable, illegal, and dangerous fireworks not managed by the stewardship organization, a multi-year contract for the hauling and disposal of those fireworks will be required.

Starting in 2019-20, CAL FIRE may need budget bill language authorizing a General Fund cashflow loan to the Fireworks Fund to support operation of the fireworks stewardship program until the annual reimbursement from the fireworks stewardship organization is received by November 1 of each year.

I. Recommendation

Alternative 1. Approve 2018-19 one-time funding of \$3.6 million ELPF and two ongoing positions, to oversee the proposed fireworks stewardship program, including increasing the state's efforts to reduce the influx of illegal fireworks into the state. Approve ongoing Fireworks Fund reimbursement authority of \$2.1 million starting in 2019-20. Adopt necessary TBL to implement the proposal.

BCP Fiscal Detail Sheet

BCP Title: Fireworks Disposal

BR Name: 3540-402-BCP-2018-MR

Budget Request Summary	FY18							
	CY	BY	BY+1	BY+2	BY+3	BY+4		
Personal Services			:					
Positions - Permanent	0.0	2.0	2.0	2.0	2.0	2.0		
Total Positions	0.0	2.0	2.0	2.0	2.0	2.0		
Salaries and Wages								
Earnings - Permanent	0	448	448	448	448	448		
Total Salaries and Wages	\$0	\$448	\$448	\$448	\$448	\$448		
Total Staff Benefits	0	344	344	338	338	338		
Total Personal Services	\$0	\$792	\$792	\$786	\$786	\$786		
Operating Expenses and Equipment								
5301 - General Expense	0	0	8	0	0	0		
5340 - Consulting and Professional Services - External -	0	2,600	1,300	1,314	1,314	1,314		
5368 - Non-Capital Asset Purchases - Equipment	0	208	0	0	0	0		
Total Operating Expenses and Equipment	\$0	\$2,808	\$1,308	\$1,314	\$1,314	\$1,314		
Total Budget Request	\$0	\$3,600	\$2,100	\$2,100	\$2,100	\$2,100		
Fund Summary Fund Source - State Operations			:					
0140 - California Environmental License Plate Fund	0	3,600	0	0	0	0		
0995 - Reimbursements	0	0	2,100	2,100	2,100	2,100		
Total State Operations Expenditures	\$0	\$3,600	\$2,100	\$2,100	\$2,100	\$2,100		
Total All Funds	\$0	\$3,600	\$2,100	\$2,100	\$2,100	\$2,100		
Program Summary Program Funding								
2461010 - Office of the State Fire Marshal	0	3,600	2,100	2,100	2,100	2,100		
Total All Programs	\$0	\$3,600	\$2,100	\$2,100	\$2,100	\$2,100		

BCP Title: Fireworks Disposal

Personal Services Details

	Sa	alary Informatio	n						
Positions	Min	Mid	Max	<u>CY</u>	<u>BY</u>	BY+1	<u>BY+2</u>	<u>BY+3</u>	<u>BY+4</u>
5157 - Staff Svcs Analyst (Gen) (Eff. 07-01- 2018)				0.0	1.0	1.0	1.0	1.0	1.0
5393 - Assoc Govti Program Analyst (Eff. 07- 01-2018)				0.0	1.0	1.0	1.0	1.0	1.0
VR00 - Various (Eff. 07-01-2018)				0.0	0.0	0.0	0.0	0.0	0.0
Total Positions			•	0.0	2.0	2.0	2.0	2.0	2.0
Salaries and Wages	CY	BY	BY+1	BY	+2	B	/+3	В	Y+4
5157 - Staff Svcs Analyst (Gen) (Eff. 07-01- 2018)	0	65	65		65		65		65
5393 - Assoc Govtl Program Analyst (Eff. 07- 01-2018)	0	75	75		75		75		75
VR00 - Various (Eff. 07-01-2018)	0	308	308		308		308		308
Total Salaries and Wages	\$0	\$448	\$448		\$448		\$448		\$448
Staff Benefits									
5150900 - Staff Benefits - Other	0	344	344		338		338		338
Total Staff Benefits	\$0	\$344	\$344		\$338		\$338		\$338
Total Personal Services	\$0	\$792	\$792		\$786		\$786		\$786